

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network Rationalization
Service Changes, 2012

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Docket No. N2012-1

**REPLY OF THE NATIONAL POSTAL MAIL HANDLERS UNION (NPMHU) IN
OPPOSITION TO USPS MOTION FOR RECONSIDERATION OF PRESIDING
OFFICER'S RULING N2012-1/5
(January 25, 2012)**

The Presiding Officer's January 12, 2012 Order, setting forth a procedural schedule for this docket, was issued after consideration of all arguments presented at the January 4, 2012 hearing and written arguments presented by all interested parties. The Postal Service has moved for Reconsideration of this Order, but in so doing, has presented the Commission with no new facts or arguments. Instead, the Postal Service has done nothing more than remind the Commission of the financial difficulties facing the Service.

While these financial difficulties are real, they do not justify denying the parties to this proceeding and the Commission sufficient time to review and understand the very complicated and dense materials presented by the Postal Service in support of its case. The Postal Service took many months to put together its initial filing. And, significantly, the Postal Service is still actively engaged in the AMP feasibility studies that will

determine the shape of the reconfigured network and the magnitude of the operational changes before the Commission. The Postal Service has stated to the Commission that it has exceeded the timeframes set forth in its own guidelines for completing these AMP feasibility studies “to ensure that quality decision-making is not sacrificed in favor of assembly-line decision-making.” See USPS Reply to Comments Regarding Scheduling and Other Procedural Matters at p. 5, n.4 (Jan. 9, 2012). The Postal Service cannot have it both ways, insisting on more time to complete its internal decision-making processes, but then seeking to deny the Commission adequate time to evaluate and offer its informed opinion of the Service’s initiative. The Postal Service’s initiative is both wide-ranging and important, and there should be adequate time for careful review—*both* by the Postal Service and the Commission—of that initiative and its potential consequences.

The NPMHU submits that the Commission properly weighed the need for expediency against the time required for adequate review when making its initial ruling in this matter. The Postal Service’s Motion for Reconsideration presents nothing that would warrant revision of that ruling and it therefore should be denied.

Respectfully submitted,

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